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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ALLERGAN USA, INC., and
ALLERGAN INDUSTRIE, SAS,

Plaintiffs,

v.

MEDICIS AESTHETICS, INC., MEDICIS
PHARMACEUTICAL CORP., VALEANT
PHARMACEUTICALS NORTH AMERICA LLC,
VALEANT PHARMACEUTICALS
INTERNATIONAL, and VALEANT
PHARMACEUTICALS INTERNATIONAL, INC.

Defendants.

Case No. 8:13-cv-01436 AG (JPRx)

**DECLARATION OF WILLIAM F. CAVANAUGH IN FURTHER SUPPORT OF
DEFENDANTS' CLAIM CONSTRUCTIONS**

I, William F. Cavanaugh, declare as follows:

1. I am a member of the law firm Patterson Belknap Webb & Tyler LLP, attorneys for the Defendants in the above-captioned case. I am admitted to practice in the State of California.
2. Attached hereto as Exhibit 11 is a true and correct copy of an excerpt of Defendants' Invalidity Contentions.
3. Attached hereto as Exhibit 12 is a true and correct copy of VAL0060322-74, U.S. Patent App. No. 2006/0040894 (filed Aug. 15, 2005).
4. Attached hereto as Exhibit 13 is a true and correct copy of VAL0060293-313, U.S. Patent App. No. 2005/0136122 (filed Dec. 22, 2003).
5. Attached hereto as Exhibit 14 is a true and correct copy of VAL0060460-64, U.S. Patent No. 5,731,298 (filed Dec. 24, 1992).
6. Attached hereto as Exhibit 15 is a true and correct copy of the May 31, 2011 Office Action concerning U.S. Patent No. 8,450,475.

1 I declare, under penalty of perjury, that the foregoing statements are true and
2 correct.

3 Date: June 27, 2014

/s/ William F. Cavanaugh, Jr.
William F. Cavanaugh, Jr.
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